

BLANK ROME LLP
Attorneys for Defendant
COSCO BEIJING INTERNATIONAL
FREIGHT CO., LTD.
LeRoy Lambert (LL-3519)
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-0208
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MED-ASIA SHIPPING LTD.,

07 Civ. 9624 (RMB)

Plaintiff,

-against-

COSCO BEIJING INTERNATIONAL
FREIGHT CO., LTD.,

Defendant.

AFFIDAVIT OF LEROY LAMBERT

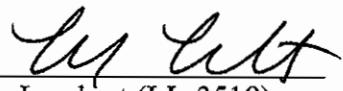
STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

LEROY LAMBERT, being duly sworn, deposes and says:

1. I am a member of the Bar of this State and Court and a partner in the law firm of Blank Rome LLP, attorneys for Defendant COSCO BEIJING INTERNATIONAL FREIGHT CO., LTD.

2. I annex as Exhibit 1 a copy of Plaintiff's complaint dated October 30, 2007

3. I annex as Exhibit 2 this Court's Order of Attachment dated October 30, 2007.
4. I annex as Exhibit 3 a copy of a fax dated January 11, 2008, from Blank Rome Hong Kong, attorneys in Hong Kong, to Dibb Lupton Alsop ("DLA"), attorneys in Hong Kong for Plaintiff.
5. I annex as Exhibit 4 defendant's Answer and Counterclaim dated January 14, 2008.
6. I annex as Exhibit 5 the Declaration of Jose-Antonio Maurellet dated January 21, 2008.
7. I understand that transfers totalling \$74,828.89 have been attached as a result of the Order of Attachment and that this amount is being held by one or more banks in New York.
8. I annex as Exhibit 6 a copy of an Escrow Agreement between Blank Rome and Defendant. I am advised that Defendant has submitted this Escrow Agreement to the relevant financial authorities in China with the request that the amount of \$315,094.65 be transmitted to Blank Rome's trust account in New York to be held pending further order of the Court.
9. As of February 6, 2008, DLA has not responded to Exhibit 3 and has not commenced arbitration or litigation in Hong Kong or anywhere else on the merits of this claim.



LeRoy Lambert (LL-3519)

Sworn to before me this
7th day of February, 2008



Notary Public

KARL V. REDA
Notary Public, State of New York
No. 30-4783126, Qual. in Nassau Cty.
Certificate Filed in New York County
Commission Expires *Nov. 30, 2009*